

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

DANIEL HOLT & SANDEE LARSEN

Case No.: 18-34290 MBK

Judge: MBK

Chapter: 13

### CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following **(choose one)**:

1. ☒ Motion for Relief from the Automatic Stay filed by LoanCare, LLC, creditor,

A hearing has been scheduled for December 11, 2019, at 9:00 a.m.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

- ☐ Certification of Default filed by \_\_\_\_\_,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons **(choose one)**:

- ☐ Payments have been made in the amount of \$ \_\_\_\_\_, but have not been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

We applied for a loan modification with LoanCare but never received a response. On 11/14/19, we met with our counsel and contacted LoanCare together. At that time, we were told the loan mod was denied and the time within which to appeal had expired. This was the first we heard of a denial. We will submit a new loan mod application. We have resumed payments and will continue making monthly payments.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 11/27/19

Date: 11/27/19

*Sander Hansen*  
Debtor's Signature

*Daniel Holt*  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.